

**From:** [Chris Waters](#)  
**To:** [Mzee, Nabil](#)  
**Cc:** [Petersen, Chris](#); [Gary Shipp](#); [Jay Keith](#)  
**Subject:** Re: Bulldog Environmental Services plan of action and access agreement  
**Date:** Thursday, June 24, 2021 12:03:23 AM

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Mr. Mzee,

I am unable to submit to you a plan of action in that time frame due to my work schedule and not knowing what is remaining on the property. I was under the impression that y'all needed my consent to access the property to make your own assessment. I am also currently financially unable to perform an extensive cleanup nor do I have the necessary equipment to perform.

Bulldog has been closed now since 02/2019.

Thank You,

Chris Waters  
432-413-5463

Sent from my iPhone

On Jun 23, 2021, at 11:41, Mzee, Nabil <mzee.nabil@epa.gov> wrote:

Chris,

In your phone conversation with FOOSC Roberto Bernier on June 11<sup>th</sup>, 2021 you indicated your intent to remove the remaining drums/containers/etc. on 204 Lawrence Ave. and 213 N. Main St. in Anton, TX for proper disposal within a month in a manner consistent with all applicable Federal and State laws and regulations. On June 11<sup>th</sup>, FOOSC Bernier asked you to provide a plan of action within 10 days to the EPA and the TCEQ to have the issues on the properties properly addressed within the next 30 days. On June 18<sup>th</sup>, you provided FOOSC Bernier a signed access agreement for 204 Lawrence Ave. Anton, TX but did not provide a plan of action to address the issues on the properties. FOOSC Bernier also reminded you on June 18<sup>th</sup> to submit a plan of action.

**Please submit a plan of action by 0600 (6AM) June 24<sup>th</sup>, 2021.** This will be your final reminder to submit a plan of action.

Thanks,

<image001.png>

**Nabil Mzee, Federal On-Scene Coordinator**  
**U.S. EPA, Region 6**  
**1201 Elm Street, Suite 500**  
**Dallas, TX 75270**  
**Office: (214) 665-7322**  
**Cell: (469) 340-9439**

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**From:** Bernier, Roberto <bernier.roberto@epa.gov>

**Sent:** Wednesday, June 16, 2021 6:48 PM

**To:** Chris Waters <[chip61712000@gmail.com](mailto:chip61712000@gmail.com)>

**Cc:** Mzee, Nabil <[mzee.nabil@epa.gov](mailto:mzee.nabil@epa.gov)>; Petersen, Chris <[petersen.chris@epa.gov](mailto:petersen.chris@epa.gov)>; Gary Shipp <[gary.shipp@tceq.texas.gov](mailto:gary.shipp@tceq.texas.gov)>

**Subject:** RE: Bulldog Environmental Services plan of action and access agreement  
Chris, I haven't received the signed Access Agreement for us to do the container assessment at the Lawrence Ave. side of the Bulldog site, so please send that to me asap as we are preparing to do the assessment. Also, remember that we are also expecting a plan of action from you to address the containers still left at both the Main St. side and Lawrence Ave. side of the property. Thanks, Roberto.

Roberto L. Bernier  
Environmental Engineer, FOSC  
Emergency Management Branch (SEDEC)  
U.S. EPA - Region 6  
(214) 665-8376  
(214) 212-4304 (cell)  
[bernier.roberto@epa.gov](mailto:bernier.roberto@epa.gov)  
NRC (800) 424-8802 EPA 6 Spill (866) 372-7745

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**From:** Chris Waters <[chip61712000@gmail.com](mailto:chip61712000@gmail.com)>

**Sent:** Saturday, June 12, 2021 8:03 AM

**To:** Bernier, Roberto <[bernier.roberto@epa.gov](mailto:bernier.roberto@epa.gov)>

**Subject:** Re: Bulldog Environmental Services plan of action and access agreement  
Roberto,

I will print this out and get it back to you as soon as possible.

Thank You,

Chris Waters

432-413-5463

Sent from my iPhone

On Jun 11, 2021, at 19:02, Bernier, Roberto <[bernier.roberto@epa.gov](mailto:bernier.roberto@epa.gov)> wrote:

Mr. Waters, as discussed today in our phone conversation regarding the conditions of the properties at 204 Lawrence Ave. and 213 N. Main St. in Anton, TX, there are still many unsecured containers, including drums and totes, that based on previous investigations conducted by us the U.S. EPA and the TCEQ appear to contain materials that are currently releasing or posing a significant threat of a release of hazardous substances to the environment, including the surrounding properties and the community. You indicated your intent to remove the containers for proper disposal within a month in a manner consistent with all applicable Federal and State laws and regulations. In addition, the investigations indicated the presence of already spilled material on the ground that must be addressed appropriately to prevent the further migration of any potential or actual

contamination.

Based on our conversation and by replying to this email, please provide a plan of action within 10 days from this communication to both us the EPA and the TCEQ to have these issues properly addressed within the next 30 days from this communication. All hazardous materials, including but not limited to, oily wastes, chemicals and compounds, hazardous substances, pollutants or contaminants must be addressed by either properly securing the containers to prevent further releases or a threat of a release of hazardous substance, pollutant or contaminant, or by removal from the property by proper disposal. Please keep in mind that storing certain hazardous materials or wastes may require you to have permits and fully comply with applicable regulations.

As also discussed, it is our intent to access the property within the next few weeks to do an assessment of the containers with possible samples taken, so please see the attached access agreement for you to fill, sign and email back to us as soon as possible. You can sign, scan and return but if you don't have scanning capabilities, a photo is acceptable. I appreciate you discussing these issues with us and fully expect you properly addressing them as indicated. Thanks and let me know if you have any questions, Roberto.

Roberto L. Bernier

Environmental Engineer, FOSC

Emergency Management Branch (SEDEC)

U.S. EPA - Region 6

(214) 665-8376

(214) 212-4304 (cell)

[bernier.roberto@epa.gov](mailto:bernier.roberto@epa.gov)

NRC (800) 424-8802 EPA 6 Spill (866) 372-7745

<accessaggreement-Bulldog-Waters.pdf>